

## REMARKS

### SUMMARY:

The subject application sets forth claims 11-20, of which claims 11 and 16 are independent claims. Pending claims 11-20 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over U.S. Patent No. 6,195,422 (Jones et al.) in view of U.S. Patent No. 6,453,029 (Campbell). Applicants respectfully traverse the prior art rejection and request reconsideration thereof based on the following remarks.

### 35 U.S.C. §103(a) REJECTION (CLAIMS 11-20):

Present claims 11 and 16 are directed to respective aspects of a decision support system, including features for acquiring calling card system data, transforming the calling card system data into searchable billing data and customer usage data, and providing queries on the searchable billing data and customer usage data. These features of the subject decision support system serve to provide a customer with the ability to make informed business decisions based on key data from a target database. The main system components laid out in respective claims 11 and 16 allow for extraction, collection and analysis of targeted data.

Numbered page 3 of the April 21, 2005 Office Action alleges that the first feature of respective claims 11 and 16, directed to either “logic for acquiring” or “an input mechanism that acquires” calling card system data, is disclosed in base reference Jones et al.

The information retrieved in Jones et al. is a Customer Profile Record (CPR) that identifies a special restricted line application to which the line a customer is calling from is subject. (See col. 10, lines 17-20 and col. 9, lines 7-9 of Jones et al.) The information associated with a CPR enables control points in the network of Jones et al. to determine from collected dialed numbers whether an originating call is local, long-distance, international, etc. If the call is not local and the line is subject to certain non-local restrictions (e.g., long-distance restrictions based on a customer's previous failure to timely pay their bill), then the CPR may also provide information regarding a user's

choice of Preferred Interexchange Carrier (PIC), who operates a prepaid calling system with which the calling party is registered. Non-local calls may subsequently be routed to the identified PIC so that required authorization measures are automatically implemented before the non-local call goes through.

In view of the foregoing, respectfully, the type of “calling card system data” retrieved in Jones et al. is specifically limited to a PIC identifier and routing information associated with a particular subscriber line or subscriber account.

The next feature of present claims 11 and 16 concerns features for transforming the acquired calling card system data into searchable billing and customer usage data. The Examiner aptly notes that Jones et al. fails to disclose such aspect of claims 11 and 16. In an attempt to cure such deficiency, the Examiner alleges that base reference Jones et al. can be modified to include the disclosure of Campbell. Numbered page 3 of the April 21, 2005 Office Action sets forth that Campbell discloses the claimed “logic for transforming the system data into searchable billing data and customer usage data”.

Applicants respectfully dispute the assertion that Campbell actually discloses such feature of respective claims 11 and 16 (as argued in greater detail below). However, even if Campbell did disclose the claimed features for transforming system data into searchable billing data and customer usage data, the modification of base reference Jones et al. to include such feature changes the principle of operation of Jones et al.

As previously mentioned, the only “system data” retrieved by the technology of Jones et al. concerns the PIC carrier and account information for a particular subscriber line or account. This basic limited information is not consistent with the type of information that could become a searchable collection of billing and customer usage data, much less a collection of information on which to provide queries, as also affirmatively set forth in present claims 11 and 16. As such, the information retrieved in Jones et al. is not capable of being transformed into searchable billing and customer usage data.

Assuming arguendo that Jones et al. were modified to retrieve such type of data,

it would change the principle of operation of such reference. As set forth in §2143.01 of the MPEP, no suggestion or modification to modify the base reference Jones et al. properly exists if the proposed modification changes the principle of operation of such reference.

Moreover, Jones et al. teaches away from the inclusion of such comprehensive steps as related to the acquisition and analysis of searchable billing and customer usage data, as set forth in respective claims 11 and 16. A principal object of the technology in Jones et al. is to retrieve basic information that will enable a user to initiate non-local calls without having to endure certain steps in authorization procedure typically associated with prepaid calling card access. Automatic authorization features disclosed in Jones et al. are intended to provide a customer with the same ease of access that is afforded to non-toll limited access customers. As such, the retrieval of information in Jones et al. is intended to simplify a user's interaction with calling card systems. Since Jones et al. teaches simplification of user interaction, modification of such reference to include retrieval and searching of additional calling card information would further change the principle of operation of such reference and render the prior art unsatisfactory for its intended purpose. Therefore, no suggestion or motivation to modify such reference properly exists.

Referring again to the April 21, 2005 Office Action, numbered page 3 alleges that secondary reference Campbell discloses features for transforming calling card system data into searchable billing data and customer usage data, as well as features for providing queries on such searchable data. For disclosure of such features, the Examiner points to col. 7, lines 28-32 and lines 46-53 of Campbell, which refers to accessing a caller's account information and converting an account balance into a certain number of minutes for a specific connection. However, respective claims 11 and 16 set forth features for transforming calling card system data into searchable billing and customer usage data. Conversion of system data into a single variable identifying the number of minutes for a specific connection, as disclosed in Campbell, is not comparable to the transformation of calling card system data into searchable data for running subsequent queries.

### **How can queries be run on a single piece of data?**

Examples of the type of data for which queries are made in accordance with aspects of the subject application include customer activation/deactivation data, customer edge, gender, price group, geographic region, credit rating, contract attributes, etc. Queries can be performed to study record amounts by customer attributes or contract attributes. Usage-related queries can assist a customer in work analysis to evaluate product success and determined network load. Another example includes the evaluation of geographic usage load by performing a query that maps the total call volume by geographic region and call/date of time.

The type of comprehensive and searchable information required by respective claims 11 and 16 on which subsequent queries may be run is much different than the type of information acquired in Campbell. Applicants respectfully submit that Campbell fails to cure the deficiencies of base reference Jones et al. More particularly, neither Jones et al. nor Campbell disclose all elements of present claims 11 and 16, particularly those concerning the transformation of calling card system data into searchable billing data and customer usage data.

With regard to claims 12-13 and 17-18, numbered page 4 of the April 21, 2005 Office Action alleges that Campbell discloses features for loading searchable data into respective billing data marts and usage data marts. First, Campbell fails to disclose searchable billing and customer usage data. Second, there is no disclosure in Campbell of the use of data marts to store information.

In accordance with aspects of the subject application, by loading transformed searchable data associated with the subject decision support systems into data marts, information available for research is focused on particular topics. Since the data marts contain only specific subsets of a production database, they are generally smaller and easier to manage. Data can then be structured in a way that suits the needs of an analyzing user, which then simplifies and dramatically reduces response times. Since Campbell does not disclose the loading of information into “data marts”, the above advantages cannot be realized.

With regard to claims 14-15 and 19-20, since Campbell does not disclose the

loading of searchable data into respective billing and usage data marts, Campbell cannot disclose the more particular aspects of such claims directed to creating summary tables of the billing and usage data marts or refreshing the data marts. Applicants respectfully submit that the creation of summary tables and implementation of data queries cannot be performed when obtained data corresponds to preselected and limited information such as that only associated with a particular subscriber line or customer account.

Based on the above remarks, Applicants submit that Jones et al. and Campbell fail to disclose or suggest, singularly or in combination, all elements of present claims 11-20. Furthermore, there is no motivation or suggestion to combine such references without changing the principle of operation of the base reference Jones et al. As such, Applicants respectfully request reconsideration of the alleged rejection grounds of claims 11-20. Applicants respectfully submit that such claims should be allowed, and acknowledgement of the same is earnestly solicited.

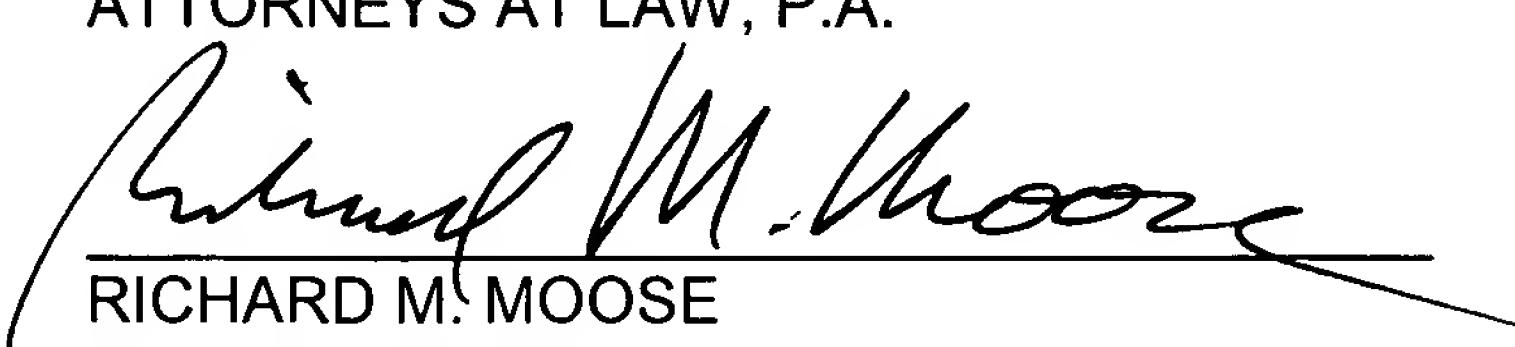
**CONCLUSION:**

For at least the reasons set forth above, Applicants respectfully submit that the present application, including claims 11-20, is in complete condition for issuance of a formal Notice of Allowance, and action to such effect is earnestly solicited. The Examiner is invited to telephone the undersigned at his convenience should only minor issues remain after consideration of this response in order to permit early resolution of same.

Respectfully submitted,

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